

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ZHAC ZHAN WU,

Defendant.

INFORMATION

AUG 05 2008

S1 08-Cr. 329 (WHP)

COUNT ONE

The United States Attorney charges:

1. From at least in or about October 200<sup>6</sup><sub>7</sub>, up to and including on or about November 1, 2007, in the Southern District of New York and elsewhere, Zhao Zhan Wu, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that Zhao Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, five hundred grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1), and

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zw

841(b)(1)(B) of Title 21, United States Code.

3. It was further a part and an object of the conspiracy that Zhao Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 100 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Sections 812, 841(a)(1), and 841(b)(1)(B) of Title 21, United States Code.

4. It was further a part and an object of the conspiracy that Zhao Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, thousands of pills containing a detectable amount of 3,4-methylenedioxymethamphetamine ("MDMA"), commonly known as "Ecstasy," in violation of Sections 812, 841(a)(1), and 841(b)(1)(C) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offenses alleged in Count One of this Information, Zhao Zhan Wu, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to

facilitate the commission of the violations alleged in Count One of this Information, including but not limited to the following:

a. At least \$1,306,500 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the narcotics offense alleged in Count One of the Information (the "Money Judgement").

b. All United States currency funds or other monetary instruments credited to account number 39652399, in the name of Zhao Zhan Wu, held at Citibank, 1 Court Square, Long Island City, New York.

Substitute Asset Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;  
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

A handwritten signature in black ink, reading "Michael J. Garcia", written over a horizontal line.

MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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**INFORMATION**

S1 08 Cr. 329 (WHP)

(Title 21 Sections 841(a)(1), 846 and 853)

Michael J. Garcia  
United States Attorney.

**A TRUE BILL**

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Foreperson.

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